

LEVIN-EPSTEIN & ASSOCIATES, P.C.

One Penn Plaza • Suite 2527 • New York, New York 10119
T: 212.792-0046 • F: 212.561.7108
E: Joshua@levinepstein.com

March 27, 2019

Via Electronic Filing

Hon. Alison J. Nathan
United States District Court
Southern District of New York
40 Foley Square, Room 2102
New York, NY 10007

Re: *Jason Strulowitz v. Flavor Boutique 796 Inc. and Flavor Boutique 522 Inc.*
Case No. 1:18-cv-08382 (AJN)

Dear Honorable Judge Nathan:

This law firm represents Plaintiff Jason Strulowitz (the “Plaintiff”) in the above-referenced action.

Pursuant to Rule 4(B) of Your Honor’s Individual Motion Practices, this letter serves as a request to approve the redactions highlighted in Exhibit “D” of the supporting affirmation of Joshua Levin-Epstein, Esq. (the “Epstein Aff.”), filed on March 22, 2019 [Dckt. No. 30].

The basis of the request is that Exhibit “D” contains certain confidential information and communications, including information obtained or exchanged in connection with settlement negotiations which are protected from disclosure and subject to Federal Rule of Evidence 408.

Accordingly, Plaintiff respectfully requests that Exhibit “D” of the Epstein Aff. be publicly filed with redactions.

In accordance with Rule 4(C) of Your Honor’s Individual Motion Practices, a copy of the unredacted version of Exhibit “D” has been sent to the Court’s email address (NathanNYSDCambers@nysd.uscourts.gov), concurrently with the filing of this letter motion. A courtesy copy of all papers associated with the request is also *en route* to Your Honor’s chambers via USPS first-class mail.

Thank you, in advance, for your consideration of this matter.

Respectfully submitted,

LEVIN-EPSTEIN & ASSOCIATES, P.C.

By: /s/ Joshua D. Levin-Epstein
Joshua Levin-Epstein
1 Penn Plaza, Suite 2527
New York, New York 10119
Tel.: (212) 792-0046
Attorneys for Plaintiff

CC: All Parties (via ECF)